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7 UNITED STATES DISTRICT COURT FOR THE  
8 WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.  
12

13 MATTHEW GREENWOOD, and  
14 JEREMY CRAHAN,

15 Defendants.

NO. MJ23-5000

STIPULATED MOTION TO EXTEND  
TIME TO SEEK AN INDICTMENT

Noted on Motion Calendar:  
**March 2, 2023**

16 With this stipulated motion, the parties jointly seek an order from this Court  
17 extending the deadline for the return of an indictment, under Title 18, United States  
18 Code, Section 3161(b), from March 16, 2023, to May 17, 2023. This extension of time is  
19 being sought for the reasons set forth below.

20 On December 31, 2022, the government filed a Criminal Complaint charging  
21 defendants Matthew Greenwood and Jeremy Crahan with *Conspiracy to Damage Energy*  
22 *Facilities*, in violation of Title 18, United States Code, Section 1366. The Complaint also  
23 charges Greenwood with the offense of *Possession of Unregistered Firearms*, in violation  
24 of Title 26, United States Code, Section 5861(d).

25 On January 3, 2023, Greenwood and Crahan made their initial appearances on the  
26 charges contained in the Complaint. Defense counsel were appointed for both defendants  
27 on that same day.

1 On January 12, 2023, at the joint request of the parties, the Court entered an Order  
2 extending the time for indictment, under Title 18, United States Code, Section 3161(b), to  
3 March 16, 2023. Dkt. 27.

4 Since that time, the government has produced all discovery materials to the  
5 defense. The defense has been diligently reviewing these materials. The defendants and  
6 their counsel are also conducting their own independent investigation of the facts and  
7 legal issues related to the charges contained in the Complaint. The defendants do not  
8 believe that this review, investigation, and research will be completed by the expiration  
9 of the current time to obtain an indictment. The defendants further believe that the results  
10 of this review, investigation, and research will be essential to preparing a defense, and  
11 may facilitate a resolution of this matter.

12 As a result, the parties request that this Court extend the time for indictment one  
13 additional time. Based on the foregoing, pursuant to 18 U.S.C. § 3161(h)(7)(A), the ends  
14 of justice served by extending the time for indictment in this case outweigh the interest of  
15 the public and of the defendant in a more speedy indictment in this matter. The requested  
16 continuance of the time for indictment will avoid a miscarriage of justice and allow  
17 defense counsel reasonable time necessary for effective preparation, taking into account  
18 the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

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1 Accordingly, the parties jointly request that the time period for the return of an  
2 indictment be extended from March 16, 2023, to May 17, 2023.

3 DATED this 2<sup>nd</sup> day of March, 2023.

4 Respectfully submitted,

5 NICHOLAS W. BROWN  
6 United States Attorney

7 /s/ Todd Greenberg  
8 TODD GREENBERG  
9 Assistant United States Attorney

10 /s/ Rebecca C. Fish  
11 REBECCA C. FISH  
12 Assistant Federal Public Defender  
13 Counsel for Matthew Greenwood

14 /s/ Lance M. Hester  
15 LANCE M. HESTER  
16 Counsel for Jeremy Crahan